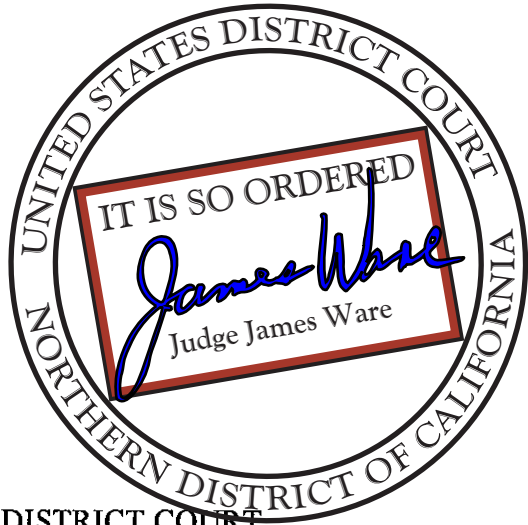


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Attorneys for Defendants
TYCO FIRE & SECURITY LLC and
SENSORMATIC ELECTRONICS



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT

SYSTEMS AMERICA, INC., a Delaware
corporation,

Plaintiff,

v.

TYCO FIRE & SECURITY, a Delaware
corporation; SENSORMATIC
ELECTRONICS CORPORATION, a
Delaware corporation; and DOES 1-100
inclusive,

Defendants.

CASE NO. C04 04845 JW

STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING TRIAL DEADLINES

Plaintiff Systems America, Inc. ("Plaintiff"), by and through its counsel Daniel L. Feder, Esq. of the Law Offices of Daniel L. Feder and Defendants Tyco Fire & Security, LLC and Sensormatic Electronics Corporation (hereinafter jointly "Defendants"), by and through their counsel Andrew S. MacKay, Esq. of Donahue Gallagher Woods LLP have been in settlement discussions and desire additional time to complete the negotiation and settlement of this matter. Therefore both parties hereby stipulate to the following:

1. The time by which Plaintiff and Defendants must serve expert disclosures is extended from February 24, 2006 to May 24, 2006.

2. The time by which Plaintiff and Defendants must disclose rebuttal experts is extended from March 27, 2006 to June 27, 2006.

3. The time by which Plaintiff and Defendants must serve a supplemental disclosure of expert witnesses is extended from April 4, 2006 to July 7, 2006.

4. The last day to hear a motion to exclude the expert or any portion of the expert's testimony is extended from May 1, 2006 to August 1, 2006.

5. The deadline for completing all discovery is extended from May 5, 2006 to August 4, 2006.

6. The last day to hear dispositive motions is extended from May 29, 2006 to August 28, 2006.

7. The preliminary trial setting conference is continued from June 26, 2006 at 11:00 a.m. to September 25, 2006 at 11:00 a.m.

Dated: February __, 2006

LAW OFFICES OF DANIEL L. FEDER

By: _____

Daniel L. Feder
Attorneys for Plaintiff
SYSTEMS AMERICA, INC.

1 Plaintiff Systems America, Inc. ("Plaintiff"), by and through its counsel Daniel L. Feder,
 2 Esq. of the Law Offices of Daniel L. Feder and Defendants Tyco Fire & Security, LLC and
 3 Sensormatic Electronics Corporation (hereinafter jointly "Defendants"), by and through their
 4 counsel Andrew S. MacKay, Esq. of Donahue Gallagher Woods LLP have been in settlement
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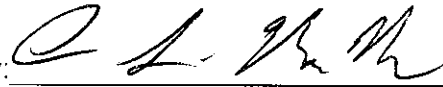
21 Dated: February 28, 2006

LAW OFFICES OF DANIEL L. FEDER

22
 23 By: Daniel L. Feder
 24 Daniel L. Feder
 25 Attorneys for Plaintiff
 26 SYSTEMS AMERICA, INC.
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1 Dated: February 21, 2006

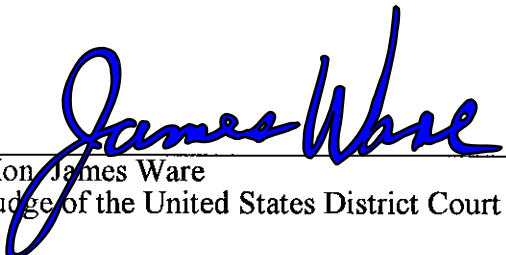
DONAHUE GALLAGHER WOODS LLP

2
3 By: 

4 Andrew S. MacKay
5 Attorneys for Defendants
6 TYCO FIRE & SECURITY, LLC and
7 SENSORMATIC ELECTRONICS
8 CORPORATION

9 IT IS SO ORDERED

10 Dated: March 8, 2006, ~~2005~~

11 
12 Hon. James Ware
13 Judge of the United States District Court
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